

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

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In re	:	Chapter 11
	:	
TERRAFORM LABS PTE. LTD.,	:	Case No. 24–10070 (BLS)
	:	
Debtor.¹	:	
	:	Re: Docket No. 69
	X	

**CERTIFICATION OF COUNSEL REGARDING ORDER (I) ESTABLISHING
PROCEDURES FOR INTERIM COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR PROFESSIONALS AND (II) GRANTING RELATED RELIEF**

The undersigned hereby certifies as follows:

1. On February 20, 2024, Terraform Labs Pte. Ltd., as debtor and debtor in possession in the above-captioned chapter 11 case (the “**Debtor**”), filed the *Motion of Debtor for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief* [Docket No. 69] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). A proposed form of order granting the relief requested in the Motion was attached to the Motion as Exhibit A (the “**Proposed Order**”).

2. Pursuant to the *Notice of Motion and Hearing* filed with the Motion, objections or responses to the Motion, if any, were to be made in writing and filed with the Court on or before February 27, 2024 at 4:00 p.m. (ET) (the “**Objection Deadline**”).

3. Prior to the Objection Deadline, the Debtor received certain informal comments (the “**Comments**”) to the relief sought in the Motion from the Office of the United

¹ The Debtor’s principal office is located at 1 Wallich Street, #37-01, Guoco Tower, Singapore 078881.

States Trustee for the District of Delaware (the “**U.S. Trustee**”). Other than the Comments, the Debtor received no other informal responses to the Motion, and no objection or responsive pleading to the Motion has appeared on the Court’s docket in this chapter 11 case.

4. The Debtor has revised the Proposed Order (the “**Revised Order**”) to resolve the Comments, and the Revised Order is attached hereto as **Exhibit 1**. For the convenience of the Court and all parties in interest, a blackline of the Revised Order marked against the Proposed Order is attached hereto as **Exhibit B**. The Revised Order has been circulated to the U.S. Trustee, and the U.S. Trustee does not object to the entry of the Revised Order.

[Remainder of page intentionally left blank]

WHEREFORE, the Debtor respectfully requests that the Revised Order, in the form attached hereto as **Exhibit 1**, be entered at the earliest convenience of the Court.

Dated: February 28, 2024
Wilmington, Delaware

/s/ Matthew P. Milana

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